

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

William E. Dugan, et al,)	
)	
plaintiffs,)	Case No. 08 C 2069
)	
v.)	Judge St. Eve
)	Room 1241
Shea's Iron Works, Inc.,)	
)	
defendant.)	

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

Defendant Shea's Iron Works, Inc., by its attorney, now makes Rule 26(a)(1) Disclosures as follows:

A. State the name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

ANSWER: Judy Shea at P.O. Box 730, 735 North Milwaukee Avenue, Lake Villa, Illinois has knowledge of Shea's Iron Erection Co. concept, and separate and unrelated nature and operation of defendant Shea's Iron Works.

Ryan Shea at P.O. Box 730, 735 North Milwaukee Avenue, Lake Villa, Illinois has knowledge of Shea's Iron Works and separate and unrelated nature and operation of Northwestern Steel Construction Co.

Mike Shea at P.O. Box 730, 735 North Milwaukee Avenue, Lake Villa, Illinois has knowledge of Local 150's efforts to seek recognition from Shea's Iron Works.

B. Provide a copy of, or a description by category and location of all documents, data compilations, and tangible things that are in the

possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

ANSWER: Documents:

- a) Contribution reports from Northwestern Steel Construction Co to Funds.
- b) Flier distributed by Local 150 in 2008 evidencing efforts to seek recognition from Shea's during picketing.

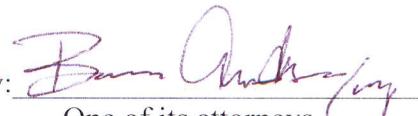
C. Provide computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, in which such computation is based, including materials bearing on the nature and extent of injuries suffered.

ANSWER: None.

D. Provide for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

ANSWER: None.

SHEA'S IRON WORKS, INC.

By: 
One of its attorneys

OF COUNSEL:

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